



# 2008-2010 RPS Procurement Verification Data Review

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# Overview of 2008 – 2010 RPS Verification



- Total of 16 retail sellers are included in 2008 - 2010 RPS Procurement Verification analysis.

The following are draft amounts based on our analysis:

- In 2008, a total of 23,827 GWh of renewable procurement from 520 renewable facilities will be verified as RPS-eligible
- In 2009, a total of 29,388 GWh of renewable procurement from 529 renewable facilities will be verified as RPS-eligible.
- In 2010, a total of 31,850 GWh of renewable procurement from 561 renewable facilities will be verified as RPS-eligible.



# 2008-2010 RPS Procurement Verification

- Staff verified 551 claims in 2008, 608 claims in 2009, and 620 claims in 2010.
- Staff identified approximately 38 over claim issues; 12 multi-fuel issues; and 13 energy delivery issues.
- 11 over claim issues were identified and resolved through collaboration with Green-e Energy's voluntary REC program.
- Staff resolved these issues with supporting documentation and, in some cases, the retail sellers corrected and re-filed their RPS claims.

# Sources of 2008-2010 Verification Data



Procurement data reported on CEC-RPS-Track forms and WREGIS Compliance Reports

Procurement data reported on SB 1305 Power Source Disclosure Program Annual Reports

Voluntary REC information – collaboration with Green-e

Generation data from:

- ✓ Generation reports provided to various Energy Commission programs
- ✓ U.S. Energy Information Administration
- ✓ Generating facilities

Supporting documentation provided by retail sellers

# California's Renewables Portfolio Standard



## *RPS Track Information – Schedule 1*

### **Facility Name**

Unit Number

Fuel Type

CEC RPS Certification #

EIA ID Number

WREIGS ID #

CEC Plant ID #

ISO Meter ID #

ISO Resource ID #

QF ID #

Other Facility Identifier

Annual Procurement (kWh)

**ALSO REPORT MONTHLY GENERATION ON SCHEDULE 2**

RPS Track form: <http://www.energy.ca.gov/renewables/documents/index.html#rps>

# WREGIS - Western Renewable Generation Information System



## WREGIS State/Provincial/Voluntary Compliance Report Information

Account Holder

Subaccount / Subaccount ID

Retirement Type

Retirement Reason

State/Province

Certification # (CEC RPS ID number)

Compliance Period

WREGIS GU ID

Generator Plant – Unit Number

Fuel Type

Vintage Year/Month (year and month the certificate was created)

Certificate Serial Number

Quantity of WREGIS Certificates

NERC e-Tags

Duration – Start / End Date

Eligibility in Other State / Voluntary Programs

Action Date (date that the WREGIS Certificate batch was retired)



# 2008-2010 RPS Verification Methodology

To verify retail sellers' procurement claims are RPS eligible Energy Commission staff:

- Verify that claims are from RPS-certified facilities.
- Determine, to the extent possible, the claim was counted only once
  - Coordinate with SB 1305 Power Source Disclosure claims, other states – OR, WA, NV and Green-e voluntary REC program.
- Verify multi-fuel facilities did not exceed de minimis requirements.
- Verify substitute energy delivery requirements for out-of-state facilities and biomethane gas were met.





# Information Included in RPS Verification Report

## Individual Retail Sellers' RPS Procurement Claims Analysis

<b>CEC RPS ID Number</b>	RPS Certification ID number assigned by CEC.
<b>Facility Name</b>	Facility name as listed on the CEC's RPS Eligible Facilities database.
<b>Fuel Type</b>	Fuel Type as listed on the CEC's RPS Eligible Facilities database.
<b>Annual Generation Procured (kWh)</b>	Procurement amount as reported by the retail seller on the CEC-RPS-Track form.
<b>RPS Procurement Claims by Other Retail Sellers (kWh)</b>	Total specific purchases reported on CEC-RPS-Track forms from other retail sellers.
<b>Procurement Reported to Power Source Disclosure Program/ Voluntary Programs (kWh)</b>	Procurement claims from other retail sellers / POUs for the same facilities as reported to the CEC's Power Source Disclosure Program or Voluntary REC market.
<b>Generation Data Used for Comparison With Procurement (kWh)</b>	Generation totals in this column are taken from various sources that collect facility-level generation information
<b>Difference Between Generation and Procurement</b>	Percentages represent the differences between the generation data source and the annual procurement claim.
<b>Generation Data Source</b>	Indicates source from which the generation data was obtained.
<b>Date RPS Certified</b>	Date that the facility's RPS certification became effective.



# RPS Procurement Verification Process



## **Staff works closely with retail sellers in the verification process to:**

- Gather supplemental documentation needed to verify claims
  - Invoices, meter data, contract information, etc.
  - Multifuel data
  - NERC e-Tags
- Make adjustments to the retail sellers' procurement claims
  - Adding additional procurement claims
  - Removing ineligible procurement claims

# Process for Removing Ineligible WREGIS Claims



- In limited cases, WREGIS allows for a certificate to be unretired within 12 months of the retirement. After 12 months, certificates cannot be unretired.
- If a procurement claim is found to be ineligible during the verification process, a retail seller may wish to remove it from its total amount claimed.
  - Using the ITS, a retail seller was able to submit a revised CEC-RPS-Track form removing the ineligible claim.
  - Using WREGIS, a retail seller is unable to unretire certificates and resubmit a revised report if it has been longer than 12 months since the certificates were retired.

# Process for Removing Ineligible WREGIS Claims



- To remove ineligible WREGIS claims outside of WREGIS, retail sellers may submit a letter to Energy Commission staff documenting which procurement claims should be removed.
  - WREGIS should be notified of these situations.
- However, WREGIS may reduce a the amount of certificates available in a future year.
  - In such cases a retail seller may submit an additional letter to Energy Commission staff requesting that the procurement be added for the year that WREGIS is reducing the certificate amounts.
- Staff will use this documentation as a basis for the final analysis, which will be used in the Verification Report.
  - The end result is that the Verification Report should be used as a final determination of eligible procurement.

# RPS Procurement Summary Table -Template



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>			
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>			
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>			
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>			
<i>Procurement of Energy Only<sup>5</sup></i>			
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>			
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>			
<b>Total Disallowances</b>			
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>			
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>			
<b>Total Pending Allowances</b>			
<b>Procurement Eligible Toward the RPS<sup>10</sup></b>			
<b>Annual Retail Sales<sup>11</sup></b>			

1 This amount was reported to the Energy Commission by the retail seller on their RPS-Track forms.

2 Facilities must be certified as RPS-eligible with the California Energy Commission for procurement to be counted toward the RPS.

3 Procurement from each facility was compared to generation reported for that facility to either the federal Energy Information Administration or various reporting programs at the Energy Commission. For facilities with more than one data source available for the generation amount, the highest amount was selected. Unless the retail seller provides documentation to support the RPS procurement claim, such as an invoice, the procurement amount exceeding the generation amount is not counted. Energy Commission staff requires supporting documentation for claims exceeding generation by 5 percent or greater.

4 Procurement from distributed generation facilities is not eligible at this time. Page 4 of the *RPS Eligibility Guidebook*, Fourth Edition, states, "The Energy Commission will certify distributed generation as RPS-eligible only if and when the CPUC authorizes applying tradable RECs toward RPS obligation." The Fifth Edition of the *RPS Eligibility Guidebook* is being updated to allow for distributed generation facilities to apply for RPS certification.

5 Page 3 of the *RPS Eligibility Guidebook*, Fourth Edition, states, "RECs and energy procured together as a bundled commodity are eligible for the California RPS." However, the Fifth Edition of the *RPS Eligibility Guidebook* is being updated to allow for the use of tradable RECs for compliance in accordance with the CPUC Decision 10-03-021.

6 Page 19 of the *RPS Eligibility Guidebook*, Fourth Edition, states that "If the annual fossil fuel use at the facility does NOT exceed a *de minimus* amount, then 100 percent of the electricity production from the facility may count as RPS-eligible".

7 Page 28 of the *RPS Eligibility Guidebook*, Fourth Edition, states, "Procurement may count toward a retail seller's RPS obligation if the generating facility was RPS certified at the time of procurement or applied for RPS certification or precertification at the time of procurement. The electricity will not be considered eligible, however, and will not be counted toward meeting an RPS obligation until the facility is actually certified by the Energy Commission as being eligible for the RPS,"

8 Page 71 of the *RPS Eligibility Guidebook*, Fourth Edition, states, "The California RPS-certification number must be shown on the Miscellaneous filed of the NERC e-Tag"

9 Page 20 of the *RPS Eligibility Guidebook*, Fourth Edition, states that any production or acquisition of biomethane that is directly supplied to the gas transportation pipeline system and used to produce electricity may generate RPS-eligible electricity if various requirements have been met.

10 This is the total RPS procurement for each year that excludes ineligible RPS procurement claims.

11 The CPUC uses the utility's previous year's retail sales number to calculate the Annual Procurement Target for that facility. This amount was reported to the Energy Commission by the retail seller on the RPS-Track form.

# DRAFT RPS Procurement Summary Tables



**The following slides show the draft summaries of the individual retail seller RPS procurement claims.**

# DRAFT 3Phases Renewables, LLC.



	2008	2009
<b>Total RPS Procurement Claimed<sup>1</sup></b>	38,196,600	10,100,000
<b>Disallowances</b>		
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0
<b>Total Disallowances</b>	0	0
<b>Pending Allowances</b>		
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	9,600,000
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>		
<b>Total Pending Allowances</b>	0	9,600,000
<b>Procurement Eligible Toward the RPS<sup>10</sup></b>	<b>38,196,600</b>	<b>500,000</b>
<b>Annual Retail Sales<sup>11</sup></b>	123,507,998	60,621,386

# DRAFT APS Energy Service



	2008
<b>Total RPS Procurement Claimed<sup>1</sup></b>	<b>4,121,000</b>
<b>Disallowances</b>	
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0
<i>Procurement of Energy Only<sup>5</sup></i>	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0
<b>Total Disallowances</b>	0
<b>Pending Allowances</b>	
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0
<b>Total Pending Allowances</b>	0
<b>Procurement Eligible Toward the RPS<sup>10</sup></b>	<b>4,121,000</b>
<b>Annual Retail Sales<sup>11</sup></b>	<b>1,070,000</b>



# DRAFT Calpine PowerAmerica-CA, LLC



	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	79,999,000	118,180,000
<b>Disallowances</b>		
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0
<b>Total Disallowances</b>	0	0
<b>Pending Allowances</b>		
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0
<b>Procurement Eligible Toward the RPS<sup>10</sup></b>	<b>79,999,000</b>	<b>118,180,000</b>
<b>Annual Retail Sales<sup>11</sup></b>	947,352,000	927,184,000

# DRAFT Constellation NewEnergy, Inc.



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	190,203,000	1,091,304,000	531,193,000
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	78,756,000	134,820,000	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	0
<b>Total Pending Allowances</b>	78,756,000	134,820,000	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>111,447,000</b>	<b>956,484,000</b>	<b>531,193,000</b>
<b>Annual Retail Sales<sup>9</sup></b>	4,744,779,000	4,552,381,000	4,191,374,000

# DRAFT Commerce Energy, Inc.



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	9,373,000	38,986,000	74,200,000
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>			
<b>Total Pending Allowances</b>	0	0	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>9,373,000</b>	<b>38,986,000</b>	<b>74,200,000</b>
<b>Annual Retail Sales<sup>9</sup></b>	588,156,000	367,093,457	361,834,217

# DRAFT Direct Energy Business, LLC



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	84,877,000	444,587,000	293,219,000
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	84,877,000	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>			
<b>Total Pending Allowances</b>	84,877,000	0	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	0	444,587,000	293,219,000
<b>Annual Retail Sales<sup>9</sup></b>	3,566,055,000	2,946,270,000	2,747,200,000

# DRAFT Praxair Plainfield Inc.



	2008
<b>Total RPS Procurement Claimed<sup>1</sup></b>	3,700,000
<b>Disallowances</b>	
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0
<i>Procurement of Energy Only<sup>5</sup></i>	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0
<b>Total Disallowances</b>	0
<b>Pending Allowances</b>	
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0
<b>Total Pending Allowances</b>	0
<b>Procurement Eligible Toward the RPS<sup>10</sup></b>	3,700,000
<b>Annual Retail Sales<sup>11</sup></b>	

# DRAFT Pilot Power Group, Inc.



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	47,642,900	47,546,000	137,128,000
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	8,166,000
<b>Total Pending Allowances</b>	0	0	8,166,000
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>47,642,900</b>	<b>47,546,000</b>	<b>128,962,000</b>
<b>Annual Retail Sales<sup>9</sup></b>	1,202,107,000	949,221,000	1,243,726,000

# DRAFT Noble Americas Energy Solutions LLC



	Updated 2007	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	198,684,068	98,165,000	307,132,000	923,102,000
<b>Disallowances</b>				
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0	0
<b>Total Disallowances</b>	0	0	0	0
<b>Pending Allowances</b>				
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	0	13,296,000
<b>Total Pending Allowances</b>	0	0	0	13,296,000
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>198,684,068</b>	<b>98,165,000</b>	<b>307,132,000</b>	<b>909,806,000</b>
<b>Annual Retail Sales<sup>9</sup></b>	4,575,024,000	4,578,964,000	5,121,185,593	5,306,240,787



# DRAFT Marin Energy Authority



	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	24,182,000
<b>Disallowances</b>	
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0
<i>Procurement of Energy Only<sup>5</sup></i>	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0
<b>Total Disallowances</b>	0
<b>Pending Allowances</b>	
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0
<b>Total Pending Allowances</b>	0
<b>Procurement Eligible Toward the RPS<sup>10</sup></b>	24,182,000
<b>Annual Retail Sales<sup>11</sup></b>	91,219,410

# DRAFT Shell Energy North America, L.P.



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	9,251,000	19,077,000	550,705,000
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	1,171,000	19,077,000	122,580,000
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	0
<b>Total Pending Allowances</b>	1,171,000	19,077,000	157,206,000
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>8,080,000</b>	<b>0</b>	<b>393,499,000</b>
<b>Annual Retail Sales<sup>9</sup></b>	1,278,000,000	2,030,053,799	2,716,178,000



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	66,025,707	91,314,755	123,999,873
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	0
<b>Total Pending Allowances</b>	0	0	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>66,025,707</b>	<b>91,314,755</b>	<b>123,999,873</b>
<b>Annual Retail Sales<sup>9</sup></b>	882,853,614	848,225,343	830,644,539

# DRAFT Sierra Pacific Power Company



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	85,685,393	117,346,000	99,499,000
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	0
<b>Total Pending Allowances</b>	0	0	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>85,685,393</b>	<b>117,346,000</b>	<b>99,499,000</b>
<b>Annual Retail Sales<sup>9</sup></b>	535,272,587	541,536,730	548,486,217

# DRAFT Pacific Gas And Electric



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	9,808,584,096	11,486,389,000	12,335,010,375
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0		
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	4,837,000	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	753,000	52,256,000	31,605,000
<b>Total Pending Allowances</b>	5,590,000	52,256,000	31,605,000
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>9,802,994,096</b>	<b>11,434,133,000</b>	<b>12,303,405,375</b>
<b>Annual Retail Sales<sup>9</sup></b>	81,523,858,615	79,624,479,319	77,485,129,257

# DRAFT San Diego Gas And Electric



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	1,047,427,926	2,098,297,000	2,229,190,000
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	0
<b>Total Pending Allowances</b>	0	0	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>1,047,427,926</b>	<b>2,098,297,000</b>	<b>2,229,190,000</b>
<b>Annual Retail Sales<sup>9</sup></b>	17,409,884,000	16,993,872,000	16,282,682,000

# DRAFT Southern California Edison



	2008	2009	2010
<b>Total RPS Procurement Claimed<sup>1</sup></b>	12,410,218,496	13,465,855,665	14,408,994,882
<b>Disallowances</b>			
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0
<b>Total Disallowances</b>	0	0	0
<b>Pending Allowances</b>			
<i>Procurement With Outstanding Issues Regarding Electricity Delivery Verification<sup>8</sup></i>	0	0	0
<i>Procurement With Outstanding Issues Regarding Biomethane Gas Delivery Verification<sup>9</sup></i>	0	0	0
<b>Total Pending Allowances</b>	0	0	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	<b>12,410,218,496</b>	<b>13,465,855,665</b>	<b>14,408,994,882</b>
<b>Annual Retail Sales<sup>9</sup></b>	79,505,151,004	78,048,183,506	75,141,421,957



# DRAFT Southern California Edison



SCE's Updated Procurement Claims for 2001 - 2007						
	2001	2003	2004	2005	2006	2007
<b>Total RPS Procurement Claimed<sup>1</sup></b>	11,129,295,651	12,421,136,541	13,182,058,213	12,821,920,025	12,485,993,807	12,211,134,722
<b>Disallowances</b>						
<i>Procurement From Facilities Without RPS-Certification<sup>2</sup></i>	0	0	0	0	0	0
<i>Procurement From Facilities in Which Procurement Claims Exceed Generation by 5 Percent or Greater<sup>3</sup></i>	0	0	0	0	0	0
<i>Procurement From Distributed Generation Facilities<sup>4</sup></i>	0	0	0	0	0	0
<i>Procurement of Energy Only<sup>5</sup></i>	0	0	0	0	0	0
<i>Procurement From Facilities That Exceeded Fossil Fuel Usage Limit<sup>6</sup></i>	0	0	0	0	0	0
<i>Procurement Claimed Before the Facility's Beginning On Date<sup>7</sup></i>	0	0	0	0	0	0
<b>Total Disallowances</b>	0	0	0	0	0	0
<b>Procurement Eligible Toward the RPS<sup>8</sup></b>	11,129,295,651	12,421,136,541	13,182,058,213	12,821,920,025	12,485,993,807	12,211,134,722
<b>Annual Retail Sales<sup>9</sup></b>	74,808,598,688	70,616,552,902	72,964,152,898	74,994,454,104	78,863,139,433	79,505,151,004

# Next Steps



- Staff will include any needed revisions to analysis of RPS procurement data.
- Report results in a *Draft 2008-2010 RPS Procurement Verification Report*.
- Draft report will be made available for public comment – planned for end of 2012.
- Once adopted by the Energy Commission, the final report will be transmitted to the CPUC for determination of compliance with RPS requirements for retail sellers.
- Once the CPUC receives the Final Verification Report, retail sellers will be required to issue “verified compliance reports” to the CPUC within 30 days.

# Public Comments



Parties may now provide verbal comments.

Please submit a blue card and your name will be called to speak.

If you would like to participate via WebEx, please send a request to the coordinator.

# Submitting Written Public Comments



**Comments are due by Monday, October 1, 2011.**

For instructions on submitting comments, please refer to the Workshop Notice.

For More Information:

<http://www.energy.ca.gov/portfolio/notices/index.html>

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